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Attorneys for Defendants  
 SHARP CORPORATION and  
 SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI  
 MDL No. 1827

This Document Relates To:  
 ALL ACTIONS

**STIPULATION AND [PROPOSED]  
 ORDER MODIFYING FACT  
 DISCOVERY CUTOFF DATE FOR  
 DEPOSITIONS OF SEIJI  
 NAKAGAWA AND QAIS SHARIF**

The Direct Action Plaintiffs (“DAPs”) and Defendants Sharp Corporation and Sharp Electronics Corporation (collectively, “Sharp”) hereby stipulate as follows:

**STIPULATION**

WHEREAS discovery closes in the “track one” DAP cases on December 8, 2011, as set forth in the Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

1 WHEREAS the Special Master's Order Regarding Individual Action Plaintiffs and  
2 Case Management (Dkt. No. 1727), approved by the Court on April 30, 2010, provides that  
3 a presumptive maximum of 12 fact witness depositions shall be taken for any single  
4 defendant group;

5 WHEREAS on September 8, 2011, the Court entered the Stipulation and Order  
6 Regarding Sharp Witness Depositions (Dkt. No. 3475), which allowed the DAPs to take the  
7 depositions of certain Sharp employees – Mr. Qais Sharif; Mr. Hiroyuki Funabashi; Mr.  
8 Tetsuroh Muramatsu; Mr. Seiji Nakagawa; and Mr. Akihiko Imai – based on Sharp's  
9 agreement to a limited number of depositions beyond the presumptive maximum;

10 WHEREAS the depositions of Messrs. Funabashi, Imai and Muramatsu have been  
11 completed, and the parties wish to have additional time past the December 8, 2011  
12 discovery cutoff to complete the depositions of Messrs. Nakagawa and Sharif;

13 NOW, THEREFORE, DAPs and Sharp, through their undersigned respective  
14 counsel, stipulate and request that the Court order as follows:

15 The fact discovery cutoff date of December 8, 2011, set forth in the Scheduling  
16 Order, is extended solely as to the depositions of Messrs. Nakagawa and Sharif, up to and  
17 including February 16, 2011.

18 Dated: December 6, 2011.

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26 By: /s/ Jacob R. Sorensen  
27 Jacob R. Sorensen

28 Attorneys for Defendants SHARP  
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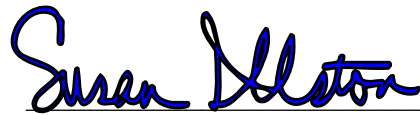
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7 By: /s/ Jerome A. Murphy  
8 Jerome A. Murphy

9 *Liaison Counsel for Direct Action Plaintiffs*

10 **IT IS SO ORDERED.**

11 Dated Entered: 12/12/11

12   
13 The Honorable Susan Illston  
14 District Court Judge

15 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that  
16 concurrence in the filing of this document has been obtained from Jerome A. Murphy.